

# Mobil Business Resources Corporation

3225 GALLOWES ROAD  
FAIRFAX, VIRGINIA 22037-0001

November 25, 1997

**RECEIVED**  
DEC 01 1997

Mr. Carlton D. Cuffman  
U. S. Environmental Protection Agency  
77 W. Jackson Blvd (SM-5J)  
Chicago, IL 60604 - 3590

**SUPERFUND PROGRAM  
MANAGEMENT BRANCH**

Subject: **Mobil Oil Corporation Response to CERCLA 104(e) Information Request  
Sauget Areas I and II, Sauguet, IL**

Dear Mr. Cuffman:

This is Mobil Oil Corporation's response to your request for information, dated September 3, 1997, for the Sauget Areas I and II sites in Sauguet / Cahokia, Illinois. Mobil thanks you for the extension of time to respond to this request.

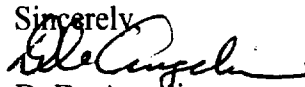
Briefly, a diligent records search was conducted, and all pertinent documentation is included as Attachments 1 through 4. The search revealed that we have very few records related to the old Mobil Refinery that first operated on the property from 1917 to 1970. Other than historical information, the environmental and operating records no longer exist. Most records relate to the wastewater treatment plant run by the City of Sauguet, and the Site O cleanup, in which Mobil is participating. Information gathered by both IEPA and PRP consultants on investigations are included. Conversations with employees provided some background on plant operations over the years, but not a complete record.

A specific nexus appears to exist for Area I, Site G, relative to photographs of paper with Mobil headings. The timeframe of the Socony Mobil Oil logo and name was about 1955 through 1966. We were not able to locate records that old regarding our disposal practices, but it appears to be a case of simple paper trash brought to Site G.

If you have any other information which you believe connects Mobil with the site, please forward it directly to me at the address below:

Dominick De Angelis  
Mobil Oil Corporation  
Superfund Response Group  
3225 Gallows Rd  
Fairfax, VA 22037

Sincerely,



D. De Angelis  
Superfund Response  
Advisor



**Environmental  
Awareness**

cc: M. A. Zuschek, Esq.

November 25, 1997

**Mobil Oil Corporation  
EPA Information Request**

**Sauget Areas I and II  
Sauget, IL**

1. The following persons either prepared or were consulted in the preparation of the answers to this Information Request: Dominick De Angelis, Mobil Oil Corporation, and Mark A. Zuschek, Esquire, Mobil Corporation Office of Legal Counsel.
2. The documents used to respond to IEPA's initial 104(e) request dated March 13, 1990, were examined in the preparation for answers to this response. No other additional records were located. The pertinent documents are attached, responsive to question numbers 7, 17, and 24.
3. There are no other persons who can provide a more detailed or complete response to this request.
4. The EPA Identification number is:  
Mobil Oil Sauget Terminal - ILD075905299  
2000 South 20th St  
Sauget, IL

Prior to the Terminal facility, the Socony Mobil Oil Refinery operated on the site. However, this facility was closed in 1970 and did not have an EPA ID number.

5. There are no current Mobil employees who have knowledge of activities at the Sauget sites in question. The Mobil employees who participated in the collection of information and who may have some knowledge of the Mobil facility in Sauget are P. D. Gates and M. C. Holland.
6. Mobil has no records of acts or omissions of any person, that caused the release of hazardous materials from the facility, or any damages resulting therefrom.
7. Mobil has previously submitted a 104(e) Information Request on March 13, 1990, which includes all the information we have on disposal of wastes to any area designated in the Information Request. Specifically, Mobil had shipped wastewater by sewer pipeline from either our former East St. Louis Refinery or the Sauget Terminal to the Village of Sauget wastewater treatment plants.

Mobil does not have shipping records of its own, but invoices from the City of Sauget for Mobil's monthly charges for use of their treatment facilities from 1988 through 1990. These invoices are included, as Attachment 1, and constitute the information contained in our initial 1990 response. In addition, as noted in the 1990 response, Mobil has records showing five shipments of petroleum waste going to Clayton Chemical and three shipments of petroleum waste going to the Wastex Research site, with Superior Equipment Co. of St. Louis, MO being

waste going to the Wastex Research site, with Superior Equipment Co. of St. Louis, MO being the transporter in all cases. Although recorded in 1990, these records are not included herein because those shipments are now involved at other Superfund sites.

- a. The wastewater was transported by sewer pipeline to the City treatment facility.
- b. The pipeline fed the treatment plant daily when the refinery was in operation (to 1970), then intermittently when the fuels terminal was in operation, and Mobil has no records regarding the specific dates of flow. The City records, attached, show monthly charges, and it is possible the City may also have general flows into their system.
- c. The wastewater generated at the Mobil facilities was probably a combination of petroleum process water after primary separation, cooling water and storm water. Chemical analyses of the effluent does not exist.
- d. The owner (generator) of the wastewater was the Mobil facilities at 2000 South 20th Street.
- e. Mobil does not have records to show volumes of wastewater flow into the Sauget treatment plant.
- f. Mobil does not have records of chemical analyses of the wastewater.
- g. Mobil does not know who made the initial arrangements to send wastewater to the City treatment plant. It was arranged at the startup of the plant about 1966.
- h. See attachment 1.
- i. Not applicable
- j. Not applicable
- k. The wastewater was treated by the City of Sauget, then discharged. The treatment plant sludge was disposed on site, in the area.
- l. See 7. k., above
- m. Not applicable- the pipeline was a direct connection to the City facility and individual transactions did not exist.
- n. Not applicable
- o. Copies are attached, as Attachment 1.

8. Mobil objects to this question as overly broad, unduly burdensome and not reasonably calculated to lead to relevant information specifically about the site. To respond, the Mobil facilities, over their history, produced and stored typical petroleum refining products, including a wide range of fuels such as gasoline, kerosine, fuel oils, and residual fuels, and heavier products such as base oils and coke. By-products, or wastes, would generally include sludges from tank bottoms, API separators, and processing units, possibly off-spec. material, used catalyst material, and non-hazardous wastes such as paper and trash. Information to compile a complete list of facility wastes was not found.

9. Mobil objects to this question as overly broad, unduly burdensome and not reasonably calculated to lead to relevant information about the site. To respond, the former refinery contained, over its lifetime, the typical processing units of the day including units for crude oil distillation, TCC (Thermoform Catalytic Cracking), HF alkylation, Ptr (naphtha pretreater), a delayed coker, kerosine treater, and catalytic polymerization. Ancillary equipment, such as boilers, cooling units, tank storage, rail car facilities, and piping were part of plant operations.

10. We have no information linking the use of these chemicals to the Mobil facilities, and based on their nature, were probably not used, except for three generic materials. Nalco is the name of a manufacturer that has a number of lines of products, including water treating chemicals and organic additives. It is possible that Nalco could have sold additives for Mobil processes or additives for primary wastewater treating, which also would have been common to many industries in the area. Likewise, a use of calcium chloride is as a drying / deicing agent and sodium sulfate is also a common drying agent. Any manufacturing facility could have potential use of these three materials.

11. See answer 10., above.

12. The only known bead-like material used at the Mobil facilities would have been the TCC (Thermoform Catalytic Cracking) catalyst.

a. The beads were used within the TCC unit to catalytically crack naphtha into higher octane gasoline.

b. The time frame for use of TCC catalyst would have been from the startup of the first TCC unit in 1944, to the closing of the refinery in 1970.

c. TCC catalyst consisted primarily of silica (Silicon dioxide,  $\text{SiO}_2$ ). Used catalyst would contain carbon, unreacted hydrocarbons, and sulfur.

d. Mobil has no records regarding the disposal of any bead catalyst at the sites in question.

13. Mobil has no records of the treatment and disposal practices and policies on off-spec. product for the Mobil Refinery facility. The fuels terminal, which continued operation after the refinery shut down, sold light fuels and generally recycled valuable product.

14. Mobil has found no records showing how the dismantled process equipment was disposed.
15. Mobil has no information regarding specific methods of disposal of PPE, lab equipment or wastes, if any disposal occurred.
16. Mobil has no knowledge of securing services from Leo Sauget or his Company.
17. The cost responsibility was, at least in part, established through apportioned flow and sludge generation into the treatment plant, as determined by the City of Sauget. Attachment 2 shows the percent of use of the treatment plant by Mobil from 1966 to 1972, during the operation of the Mobil refinery to 1970, then the terminal during 1971 and 1972. Attachment 3 (previously submitted) is a letter of agreement dated 2/10/87 on Monsanto stationary, in which Mobil agreed to participate in a group, at a 9 percent share, to close lagoons and pits.
18. Mobil has no knowledge of intentional or accidental spills into Dead Creek.
19. Mobil does not have records documenting the handling or discharge of wastewater from the facility prior to the construction of the treatment plant. Attachment 2 indicates that Mobil connected to the treatment plant in January of 1966, shortly after it was built.
20. Records are not available documenting analyses of the wastewater. The city would presumably have flow records.
21. Mobil has not located copies of City permits or licenses.
22. Mobil has not located any records related to PCB reporting requirements under 40 CFR, 761.180. If those records are found, we will send them to you.
23. Mobil is aware of an environmental evaluation that was performed by Geraghty and Miller, for the City of Sauget, entitled, "Evaluation of the proposed Cap and Side Walls for the Four Lagoons and Pit at the Village of Sauget Treatment Plant Sites", in May of 1989. This was performed for the City and they should have a complete copy. Water movement and quality should have been documented.
24. Attachment 4 is a packet of material, dated 2/27/89, that was presented at a meeting at Sauget Village Hall, summarizing results of investigations within the subject site areas. It was prepared by IEPA's consultant, Ecology and Environment, Inc.
25. The East St. Louis Refinery was erected in 1917 by the Lubrite Refining Company, for the processing of lubricating oil. In 1930, the Vacuum Oil Company purchased controlling interest in Lubrite Refinery, followed by a merger with Standard Oil Company of New York in 1931. At this time (1931), the refinery became part of the Lubrite Division of the merged companies, who were incorporated as the Socony-Vacuum Oil Company. In 1955, the Company name was changed from Socony-Vacuum to Socony Mobil Oil Company and 1966 changed names again to Mobil Oil Corporation.

26. See answers to questions 23 and 24.

27. Mobil is not familiar with the storage or disposal of the chemicals listed, and did not manufacture chemicals. As a petroleum manufacturing facility, it generated and cleaned tank bottoms. Post RCRA (1980), tanks were cleaned by contractors, who hauled out the wastes using the manifest system. However, we have been unable to locate documents for the requested time period 1950 to 1985. Post 1985 records do not show transportation or disposal at the Sauget sites in question. However, these documents were submitted in the previous response of 1990.

28. See answer to question 25.

29. Mobil has no information regarding the use or disposal of filter media at its facilities in Sauget. However, refineries in general used various types of filter media including clay filters for fuels, silica gel for drying wet product, and cloth media for filtering out particulates.